

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

RACHEL LYNN WILLIAMSON
and CONSTANCE NOCOA,
individually and on behalf of all others
similarly situated

Plaintiffs,

vs.

GERARDO LORENZO LINARDUCCI,
an Indiana individual, and
INTEGRITY WEALTH PARTNERS,
LLC, an Indiana limited liability
Corporation, and DUCCI
ENTERPRISES, LLC, an Indiana
limited liability corporation,

Defendants.

CASE NO.: 1:24-CV-01526-TWP-MJD

DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 6-1(c), Defendants Gerardo Lorenzo Linarducci, Integrity Wealth Partners, LLC and Ducci Enterprises, LLC, collectively, (the “Defendants”), by counsel, move this Court for an extension of time of forty-five (45) days within which to answer or otherwise respond to the Complaint of Plaintiffs Rachel Lynn Williamson and Constance Noco, individually and on behalf of all other similarly situated (collectively, the “Plaintiffs”). In support of this motion, Defendants state the following:

1. On September 6, 2024, Plaintiffs filed their Class Action Complaint and Demand for Jury Trial (“Complaint”). (Dkt. No. 1.) The Summons and Complaint were served on September 14, 2024. (Dkt. No. 7.)

2. Defendants’ response to the Complaint is currently due on or before October 7, 2024, which time has not yet passed.

3. Defendants’ counsel was only recently retained on October 3, 2024.

4. The Complaint contains 120 paragraphs of allegations and alleges seven different counts. (Dkt. No. 1.) Given the extensive nature and scope of the allegations, the complexity of the subject matter and legal theories raised by the Complaint, Defendants counsel cannot in the exercise of reasonable diligence prepare Defendants’ response to the Complaint within the time of an automatic initial extension of time of twenty-eight (28) days. *See* Local Rule 6-1(a).

5. In addition, the undersigned counsel, Kevin Koons, will be out of town on a pre-planned family vacation for Fall Break from October 12, 2024, through October 19, 2024.

6. Both counsel for Defendants have responsibilities and deadlines in other litigation matters in the next two months.

7. Based on the foregoing, there is good cause for a forty-five (45) day extension of time, up to and including November 22, 2024.

8. Defendants’ counsel contacted Plaintiffs’ counsel via email on October 3, 2024, regarding this request, and Plaintiffs’ counsel replied by email the following day indicating they had no objection to this extension.

WHEREFORE, Defendants, Gerardo Lorenzo Linarducci, Integrity Wealth Partners, LLC and Ducci Enterprises, LLC, respectively request that the Court extend the time to answer or otherwise respond to Plaintiffs' Complaint to and including November 22, 2024.

Respectfully submitted,

/s/ Kevin D. Koons

Kevin D. Koons, Atty. No. 27915-49

Justin R. Olson, Atty. No. 31450-49

KROGER, GARDIS & REGAS, LLP

111 Monument Circle, Suite 900

Indianapolis, IN 46204

Phone: (317) 692-9000

kkoons@kgrlaw.com

jolson@kgrlaw.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on October 7, 2024, I filed the foregoing *Appearance of Counsel* electronically with the Clerk of the Court. Notice of this filing will be sent to the following by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Mark E. Maddox
Maddox Hargett & Caruso, P.C.
10150 Lantern Road
Suite 175
Fishers, IN 46037
mmaddox@mhclaw.com

Brian Pastor
Sonn Law Group PA
3455 Peachtree Rd Rd NE
Ste 500
Atlanta, GA 30326
bpastor@sonnlaw.com

Shawn M. Good
Ross M. Good
The Good Law Group
800 E. Northwest Hwy
Suite 814
Palatine, IL 60074
Shawn@thegoodlawgroup.com
ross@thegoodlawgroup.com
Jeffrey R. Sonn
Sonn Law Group PA
19495 Biscayne Blvd.
Suite 607
Aventura, FL 33180
jsonn@sonnlaw.com

/s/ Kevin D. Koons

Kevin D. Koons

KROGER, GARDIS & REGAS, LLP
111 Monument Circle, Suite 900
Indianapolis, IN 46204
Phone: (317) 692-9000